

Jonathan A. Rich, Esq.
Nevada Bar No.: 15312
COZEN O'CONNOR
500 North Rainbow Blvd., Suite 300
Las Vegas, NV 89107
Telephone: (702) 470-2324
Facsimile: (702) 470-2359
Email: JARich@cozen.com

Attorney for Defendant
Perry Johnson & Associates, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RONNIE GILL, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

PERRY JOHNSON & ASSOCIATES, INC.

And

NORTHWELL HEALTH, INC.,

Defendants.

CASE NO.: 2:23-cv-01851

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS PERRY JOHNSON &
ASSOCIATES, INC. AND NORTHWELL
HEALTH, INC. TO RESPOND TO
PLAINTIFF RONNIE GILL'S
COMPLAINT**

(SECOND REQUEST)

Plaintiff Ronnie Gill, individually and on behalf of all others similarly situated, ("Plaintiff") and Defendants Perry Johnson & Associates, Inc. ("PJ&A") and Northwell Health, Inc. ("Northwell" and, collectively with PJ&A, "Defendants") stipulate and respectfully request under Local Rule IA 6 that this Court extend the time for Defendants to respond to Plaintiff's complaint in the above-captioned action (the "Complaint") until **March 1, 2024**.

Plaintiff filed the Complaint on November 10, 2023 and served Northwell on November 17, 2023 and PJ&A on December 5, 2023, respectively.

On December 8, 2023, Plaintiff filed a Motion for Transfer of Actions to United States District Court for the District of Nevada for Coordinated or Consolidated Pretrial Proceedings

1 Pursuant to 28 U.S.C. § 1407 (the “Motion”) in the Judicial Panel on Multidistrict Litigation
2 (“JPML”). *See In re Perry Johnson & Associates Medical Transcription Data Security Breach*
3 *Litigation*, Case MDL No. 3096, ECF No. 1 (December 8, 2023). The motion directly concerns the
4 potential consolidation and transfer of at least forty-five related putative class action complaints.
5 The JPML heard oral arguments on the Motion on January 25, 2024.

6 Defendants’ individual responses are currently due by January 29, 2024.

7 This extension is necessary to allow the JPML sufficient time to evaluate the various related
8 actions, twenty-one of which have been filed in this District alone. A list of these related actions is
9 included as Appendix A. As nearly every party—including Plaintiff and Defendants—has agreed
10 that centralization is proper, the primary question for the JPML is *where* to centralize the cases, not
11 *whether* to centralize them.

12 Plaintiff and the Defendants consent to this request. This is the second request for extension
13 of time for this deadline. The parties respectfully submit that there is good cause for this extension
14 and the requested extension is not for the purpose of delay.

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17 IT IS SO STIPULATED.

1 Dated: January 26, 2024.

2 SNELL & WILMER

3 By: /s/ Alex L. Fugazzi

4 Alex L. Fugazzi (NV Bar #9022)
5 Aleem A. Dhalla (NV Bar #14188)
6 3883 Howard Hughes Parkway, Ste 1100
7 Las Vegas, NV 89169-5958
8 Phone: (702) 784-5200
9 afugazzi@swlaw.com
10 Adhalla@swlaw.com

11 William L. Roberts*
12 Kathryn E. Caldwell*
13 Andrew B. Cashmore*
14 ROPES & GRAY LLP
15 Prudential Tower
16 800 Boylston Street
17 Boston, Massachusetts 02199-3600
18 Phone: (617) 951-7000
19 Fax: (617) 951-7050
20 william.roberts@ropesgray.com
21 kathryn.caldwell@ropesgray.com
22 andrew.cashmore@ropesgray.com

23 Glen J. Dalakian II*
24 ROPES & GRAY, LLP
25 1211 Avenue of the Americas
26 New York, New York 10036-8704
27 Phone: (212) 596-9000
28 Fax: (212) 596-9090
glen.dalakian@ropesgray.com
Counsel for Defendant Northwell Health, Inc.
**pro hac vice forthcoming*

Dated: January 26, 2024.

WISE LAW FIRM, PLC

By: /s/ David Hilton Wise

David Hilton Wise (NV Bar #11014)
421 Court Street
Reno, NV, 89501
Phone: (775) 329-1766
Fax: (703) 934-6377
dwise@wiselaw.pro

Joseph M. Lyon (*Pro Hac Vice*)
Kevin M. Cox (*Pro Hac Vice*)
THE LYON FIRM
2754 Erie Avenue
Cincinnati, OH 45208
Phone: (513) 381-2333
Fax: (513) 766-9011
jlyon@thelyonfirm.com
kcox@thelyonfirm.com

Counsel for Plaintiff and Putative Class

Dated: January 26, 2024.

COZEN O'CONNOR

By: /s/ Jonathan A. Rich

Jonathan A. Rich (NV Bar #15312)
500 North Rainbow Blvd., Suite 300
Las Vegas, NV 89107
Phone: (702) 470-2324
Fax: (702) 470-2359
jarich@cozen.com
Counsel for Defendant Perry Johnson & Associates, Inc.

Despite the parties' failure to include an appropriate signature block as required by Local Rule, overlooked on this one occasion, IT IS HEREBY ORDERED that the Stipulation for Extension of Time (ECF No. 20) is GRANTED.


U.S. MAGISTRATE JUDGE

Dated: January 26, 2024